

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
ALEXANDRIA DIVISION**

AMAZON.COM, INC. and AMAZON  
DATA SERVICES, INC.,

Plaintiffs,

v.

WDC HOLDINGS LLC dba NORTHSTAR  
COMMERCIAL PARTNERS; BRIAN WATSON;  
STERLING NCP FF, LLC; MANASSAS NCP FF,  
LLC; NSIPI ADMINISTRATIVE MANAGER;  
NOVA WPC LLC; WHITE PEAKS CAPITAL LLC;  
VILLANOVA TRUST; CARLETON NELSON;  
CASEY KIRSCHNER; ALLCORE DEVELOPMENT  
LLC; FINBRIT HOLDINGS LLC; CHESHIRE  
VENTURES LLC; JOHN DOES 1-20,

Defendants.

800 HOYT LLC,

Intervening Interpleader Plaintiff /  
Intervening Interpleader Counter-  
Defendant,

v.

BRIAN WATSON; WDC HOLDINGS, LLC; BW  
HOLDINGS, LLC,

Interpleader Defendants,

and

AMAZON.COM, INC., and AMAZON DATA  
SERVICES, INC.,

Interpleader Defendants / Interpleader  
Counter-Plaintiffs.

Case No. 1:20-cv-00484-RDA-TCB

**DECLARATION OF CHARLES F. CONNOLLY IN SUPPORT OF NON-PARTY IPI  
PARTNERS, LLC'S AMENDED OPPOSITION TO DEFENDANT BRIAN WATSON'S  
MOTION TO COMPEL COMPLIANCE WITH RULE 45 SUBPOENA**

Pursuant to 28 U.S.C. § 1746, I, Charles F. Connolly, hereby declare under penalty of perjury as follows:

1. I am over the age of 18 years. I have personal knowledge of the facts set forth below.
2. I am an attorney licensed to practice law in this honorable Court. I am an attorney at the law firm of Akin Gump Strauss Hauer & Feld, LLP (“Akin Gump”), and counsel for non-party IPI Partners, LLC (“IPI”).
3. I submit this Declaration in support of Non-Party IPI Partners, LLC’s Amended Opposition to Defendant Brian Watson’s Motion to Compel Compliance with Rule 45 Subpoena. If called as a witness, I could testify to the same as stated herein.
4. Attached hereto as **Exhibit A** is a true and correct copy of an email chain on January 31, 2022, among [sop@cscinfo.com](mailto:sop@cscinfo.com), Courtney Briggs, Nitin Sathe, and Yvette Hamilton, with the subject line, “Notice of Service of Process - Transmittal Number: 24398703.”
5. Attached hereto as **Exhibit B** is a true and correct copy of an email chain starting on March 14, 2022, and ending on March 24, 2022, among myself, Jacob Grubman, Allison Thornton, Stephanie Lindemuth, and Jeffrey Hamlin, with the subject line, “Agreed Protective Order (Dkt. 55).”
6. Attached hereto as **Exhibit C** is a true and correct copy of a letter dated March 25, 2022, from me to Stanley L. Garnett, Jeffrey Hamlin, and Jacob Grubman, Re: “IPI Production No. 1, *Amazon.com, Inc., et al. v. W.D.C. Holdings LLC d/b/a Northstar Commercial Partners, et al.*, 1:20-cv-484 (E.D. Va.).”
7. Attached hereto as **Exhibit D** is a true and correct copy of an email I received on March 30, 2022 (Eastern Prevailing Time), from Jake Grubman to me, Allison Thornton,

Stephanie Lindemuth, Elizabeth Papez, Patrick Stokes, Claudia Barrett, Michael Dziuban, Veronica Moyé, Aline M. McCullough, Jamie Hubbard, Casey Kirschner, George Calhoun, Jeff Hamlin, James Trusty, Stanley Garnet, Amanda Houseal, Sara R. Bodner, Catherine M. Olguin, Neil S. Sandhu, Leah M. Regan-Smith, Adam Smart, and Alex Little with the subject line, “Brian Watson’s Motion to Compel Non-Party IPI Partners, LLC’s Compliance with Rule 45 Subpoena.”

8. Attached hereto as **Exhibit E** is a true and correct copy of an email chain starting on March 30, 2022 and ending on April 6, 2022, among Stephanie Lindemuth, Jake Grubman, Jeff Hamlin, Stanley Garnett, Allison Thornton, Erica Holland, Richard Cochrane, and me with the subject line, “Brian Watson’s Motion to Compel Non-Party IPI Partners, LLC’s Compliance with Rule 45 Subpoena.”

9. Attached hereto as **Exhibit F** is a true and correct copy of a letter dated April 1, 2022, from me to Stanley L. Garnett, Jeffrey Hamlin, and Jake Grubman, Re: “IPI Production No. 2, *Amazon.com, Inc., et al. v. W.D.C. Holdings LLC d/b/a Northstar Commercial Partners, et al.*, 1:20-cv-484 (E.D. Va.).”

10. Attached hereto as **Exhibit G** is a true and correct copy of a letter dated April 7, 2022, from me to Stanley L. Garnett, Jeffrey Hamlin, and Jake Grubman, Re: “IPI Production No. 3, *Amazon.com, Inc., et al. v. W.D.C. Holdings LLC d/b/a Northstar Commercial Partners, et al.*, 1:20-cv-484 (E.D. Va.).”

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief.

Dated: April 22, 2022

/s/ Charles F. Connolly  
Charles F. Connolly

**CERTIFICATE OF SERVICE**

I certify that on April 22, 2022, I electronically filed this document through the ECF system, which will send a notice of electronic filing to all counsel of record.

*/s/ Charles F. Connolly*

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